

2022 FEB 24 PM 4:28
USDC-EPH RECD CLERK

UNITED STATES FEDERAL DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA
601 Market Street First Floor, Federal Courthouse
Philadelphia Pennsylvania 19106

UNITED STATES OF AMERICA
ex-rel ESTATE OF NOBLE,
OFFICE OF THE SECRETARY
U.S. DEPARTMENT OF URBAN DEVELOPMENT
Plaintiff/Claimant

vs

COURT OF COMMON PLEAS et. alii

Rochelle Bilal, Sheriff

Case no. 2:22-CV-00295

OFFICE OF THE SHERIFF
PHILADELPHIA COUNTY et. alii

Anthony H. Banone CEO. and
BANK OF AMERICA NA. et. alii

ROBERTSON, ANSCHUTZ, SCHNEID, CRANE & PARTNERS PLLC et. alii
Defendant(s)/Respondent(s)

Letter to the Honorable Judge Wolson

To: Honorable Judge Joshua D. Wolson;

Here is a Brief Statement regarding my 2:30 pm negotiations with Keith Lorenze, General Counsel for Robertson, Anschutz, Schneid, Crane & Partners, PLLC (RAS) 02/23/2022, which occurred today.

Mr. Lorenze was asked (who) you represent, he replied the Law Firm, Robertson, Anschutz, Schneid, Crane & Partners, PLLC (RAS) I replied don't you represent Bank of America, his reply no we do not, at that point I was floored, so now attached is a copy of the Law Firms Letterhead of Robertson, Anschutz, Schneid, Crane & Partners, PLLC (RAS), showing that they do represent BANK OF AMERICA according to their documentation, at that time my Trustee's Present witnessed what Mr. Lorenze comment, and was found it to ambiguous to say (t)he less, my goal was not to waste (t)he Court's time and I was praying that this could have been professionally resolved, but to avail Mr. Lorenze did not negotiate in good faith this is not an attempt to throw stone's at Mr. Lorenze but just to bring to (t)he Courts attention our intent to collaborate

Exhibit 25A

ROBERTSON, ANSCHUTZ, SCHNEID, CRANE & PARTNERS, PLLC
 ATTORNEYS FOR PLAINTIFF
 Meghan Power, Esq. ID No. 325147
 133 Gaither Drive, Suite F,
 Mount Laurel, NJ 08054
 mepower@raslg.com
 Phone: 855-225-6906

BANK OF AMERICA, N.A.,
 14405 WALTERS ROAD, SUITE 200,
 HOUSTON, TX 77014
 Plaintiff,

v.

REGINALD NOBLE YHWH
 And/or Tenant/Occupant
 1533 ORLAND STREET
 PHILADELPHIA, PA 19126
 Defendant(s)

COURT OF COMMON PLEAS
 PHILADELPHIA COUNTY

NO: 190501616

ACTION IN EJECTMENT

WRIT OF POSSESSION

TO THE SHERIFF OF PHILADELPHIA COUNTY:

- (1) To satisfy the judgment for possession in the above matter you are directed to deliver possession of the following property to:

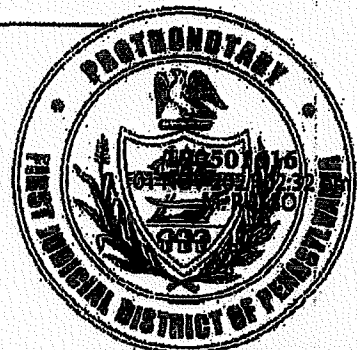
BANK OF AMERICA, N.A.
 (See Legal Description Attached)

- (2) To satisfy the costs against Defendants, you are directed to levy upon any property of Defendants and sell their interest therein.

PROTHONOTARY

By _____
 Clerk

Date _____



18-187282 - MeM

Case ID: 190501616

254051

Exhibit 25B

COURT OF COMMON PLEAS

NO. 190501616

BANK OF AMERICA, N.A.
Plaintiff

v.

REGINALD NOBLE YHWH
TENANT/OCCUPANT
Defendant(s)

WRIT OF POSSESSION

Costs
Prothy Pd.
Judgment Fee
Satisfaction Fee

By *Meghan Pomeroy*
ROBERTSON, ANSCHUTZ, SCHNEID, CRANE & PARTNERS, PLLC
133 Gaither Drive, Suite F
Mount Laurel, NJ 08054
ATTORNEY FOR PLAINTIFF

NOV -14 2021 A 10:00

PHILADELPHIA SHERIFF'S OFFICE
CIVIL OPERATIONS

Address: 1533 ORLAND STREET PHILADELPHIA, PA 19126
WHERE PAPERS MAY BE SERVED

2022 FEB 24 PM 03:11
USDC-EDPA RECEIVED

UNITED STATES FEDERAL DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA
601 Market Street First Floor, Federal Courthouse
Philadelphia Pennsylvania 19106

UNITED STATES OF AMERICA
ex-rel ESTATE OF NOBLE,
OFFICE OF THE SECRETARY
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Plaintiffs/Claimant

vs

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ROBERTSON, ANSCHUTZ, SCHNEID, CRANE & PARTNERS PLLC et. al
Defendants/Respondents

**MEMORANDUM FOR EMERGENCY INJUNCTION AND RESTRAINING
ORDER**

We, the People of the United States of America present Reginald C. Noble Plaintiff/Claimant in this matter hereby bring to the attention of this Honorable Court, pursuant to Federal Rule 65 of Civil Procedure, as follows:

JURISDICTION AND BASIS FOR JURISDICTION

Federal Jurisdiction

Pursuant to 28 U.S.C. § 1332, citizens of different states or nations who bring any action against those of a different state or nation in excess of \$75,000 are within proper jurisdiction of this court. In addition, and pursuant to 28 U.S.C. § 1331, those matters arising under the United States Constitution or federal laws or treaties are federal cases.

Plaintiffs aver that this matter is subject to both diversity in residency as well as federal laws, both of for which Plaintiffs demand federal jurisdiction.

Additional Basis for Jurisdiction

This court has plenary power to administer *equity* according to well-settled principles of *equity* jurisprudence in cases and subject matters under its jurisdiction; *Turner v. Hostellar*, 359 Pa. Super. 167,518 A.2d 833 (1986). Under Rule 3165 “After execution and return of the writ, if the accused shall reenter into possession, the Prothonotary, upon Praecipe and affidavit setting forth the facts, filed within (3) years after the return of the writ on which execution was completed, shall issue a new writ of possession.” This Court also has jurisdiction over this matter pursuant to 35 U.S.C. §31, 28 U.S.C. § 2201 (the uniform Declaratory Judgment Act), 28 U.S.C. § 151 and 28 U.S.C. 85 §1338 as this court has personal jurisdiction over all Respondent(s) because all Respondent(s) are organized in, residents of and/or have their principal offices in this judicial district. Additionally, venue is proper in this court pursuant to 28 U.S.C. 87 because Respondent(s), have a regular and established place of business in this Judicial District, as defined in 28 U.S.C. 451, notwithstanding that the Respondents affiliate with or within the Federal Reserve District and because jurisdiction in Pennsylvania is a creature of the Constitution. A challenge can be raised by any party or by the court *sua sponte*, at any time, even on appeal. Jurisdiction can be challenged at any time, and Jurisdiction, once challenged, cannot be assumed, and must be decided. The District Court of Philadelphia County, Pennsylvania cannot rule on its own jurisdiction.

WHY THE COURT SHOULD NOT REMAND THIS MATTER TO THE PHILADELPHIA COURT OF COMMON PLEAS

Plaintiffs avers that its “*subject trust property*” has received several unwarranted *foreclosure* and *writs* of ejectment under court registry investment docket number #190501616 and #180400911, respectfully, which Plaintiffs submits to this tribunal, were all induced by, (1) an invalid summary judgment, if any; (2) fraudulent conveyance; (3) forged documents (deed) and; (4) unconstitutional actions. Citing *Christos Sourovelis Plaintiff v. City of Philadelphia Defendant(s) et. alii. Case no 14-4687, Order certified January 3, 2020*:

“[U]pon consideration of “Plaintiff s” and Additional Plaintiffs who are entitled to the return of their property that was unlawfully taken from them in direct violation of the Pennsylvania Constitution and the Order entered by the Commonwealth Court, In case law cited as Commonwealth of Pennsylvania, vs. Justin Irland; The Commonwealth and its courts never had right to confiscation authority and that it never came with them from across the sea. Also Religious Immunity from (tax, levy, and feess [*sic*]) As cited by our Supreme Court, in *Murdock vs. Pennsylvania*, cited as case law, 319 U.S. 105, et. seq. Incorporated and made part of this order.”

These current actions are in contempt to this Order, which Order appears to have no effect on the activity of the parties addressed.

Plaintiffs, now two years later, moves the honorable court to issue an order in the form of MANDAMUS as an Emergency Permanent Injunction to prevent the ongoing actions in contempt. The “...unlawful confiscation by Deceptive Business Practices of persons acting on the supposed authority of City Philadelphia, Its Agents and Attorneys and under the Commonwealth and its Court(s) in direct violation of the Commonwealth of Pennsylvania Article 1, Section 8, the Federal Constitution Fourth Amendment and Deviation of Rights 241-242, of Plaintiff, to further expound on why this case OUGHT not be remanded is violation of the Fifth Amendment and Fourteenth Amendment to the

United States Constitution which declare that governments cannot deprive any person of "life, liberty, or property" without due process of law.

A brief historical outline of the Defendants actions and violations against Plaintiffs are as follows:

1. On or about March 17th, 1981, an unlawful fraudulent deed transfer was committed, and forged Reginald C. Noble Trust off, and said deed had no notary stamp or seal making that deed VOID on its face.
2. The contempt of the law firm RAS Citron Laws Offices violation of Judge Ida Fox Order October 23rd 2018, in which a Trial Pool for November 2019 was scheduled
3. On or about March 2019 an unlawful Sheriff Sale was committed.
4. On or about July 19th 2019 a order was submitted for a case management hearing for August 19th 2019 see exhibit 35A, which was completed
5. On or about August 8th a Motion for Judgment entered by RAS Citron Law Offices was Denied by Judge Wright.
6. On or about October 2019 Motion for Summary Judgment was entered and granted the same filing as the Motion for Judgment.

FOR THESE REASONS, as result of the foregoing, Plaintiffs move this honorable Court to the grant an Injunction and Restraining Order in favor of Plaintiff:

1. Prohibiting the Defendants and all persons acting on any Defendant's behalf which enjoins them from further actions seeking confiscation or otherwise trespassing on Plaintiff's subject land, in violation of prior orders against such activities;
2. Denying Defendants request to remand this matter to Commonwealth Court, pending entry by the Court of a final judgment in this action.

3. Other such relief as may be deemed appropriate by this Court.

Respectfully submitted,

A handwritten signature in blue ink, consisting of a large, stylized loop followed by a horizontal stroke and a small dot.

Reginald Noble YHWH - heir

2022 FEB 24 PM 4:32
USDC-EDPA REC'D CLERK

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the ____ day of February 2022, I will hand deliver the foregoing document to the following:

Keith R. Lorenze, Esq. General Counsel
Robertson, Anschutz, Schneid, Crane & Partners, PLLC
133 Gaither Drive Suite F
Mount Laurel, New Jersey 08054
klorenze@raslg.com

Michell H. Badolato Esq.
Stradley, Ronon, Steven, & Young, LLC.
457 Haddonfield Road, Suite 100
Cherry Hill New Jersey 08002-2223

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY
Room 386 CITY HALL
Philadelphia, PA 19107
Attn: President Honorable Judge Idee Fox

Rochelle Bilal, Sheriff
OFFICE OF THE SHERIFF, Philadelphia County
100 South Broad Street 5th Floor
Philadelphia Pa. 19110
Defendant(s)

Marcia Fudge Secretary
U.S. Department of H.U.D
2344 Rayburn Hob.
Washington, D.C. 20515
Plaintiff



Reginald Noble YHWH - heir

2022 FEB 24 PM 4:01
USDC-EDPA RECD CLERK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA
601 Market Street Second Floor, Federal Courthouse
Philadelphia Pennsylvania 19106

REGINALD C. NOBLE, UNITED STATES OF AMERICA
ESTATE OF NOBLE, IN TRUST TO REGINALD C. NOBLE
GRANTOR/SETTLER EX-REL ESTATE OF NOBLE
OFFICE OF THE SECRETARY FOR
HOUSING & URBAN DEVELOPMENT et. alii.

Plaintiff/Claimant

vs

Case no. _____

COURT OF COMMON PLEAS, PHILADELPHIA et. alii

OFFICE OF THE SHERIFF
PHILADELPHIA COUNTY et. alii

Anthony H. Banone CEO. and
BANK OF AMERICA NA. et. alii

ROBERTSON, ANSCHUTZ, SCHNEID, CRANE & PARTNERS PLLC et. alii
Defendant(s)/Respondent(s)



ORDER



On this _____ day in the month of _____ in the year, 20____,

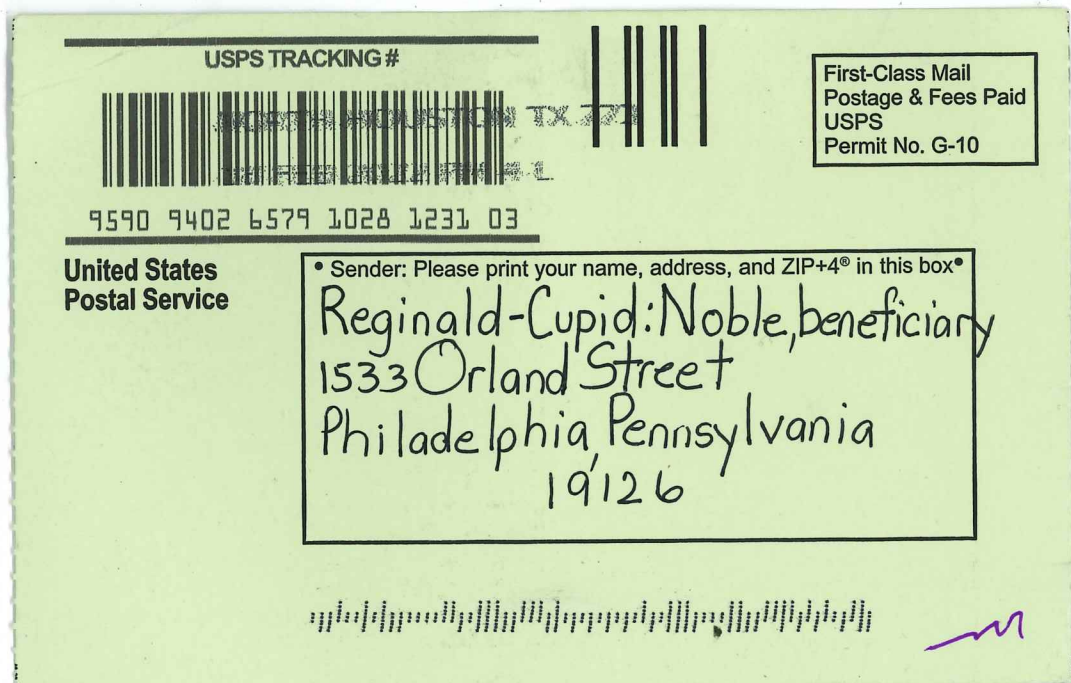
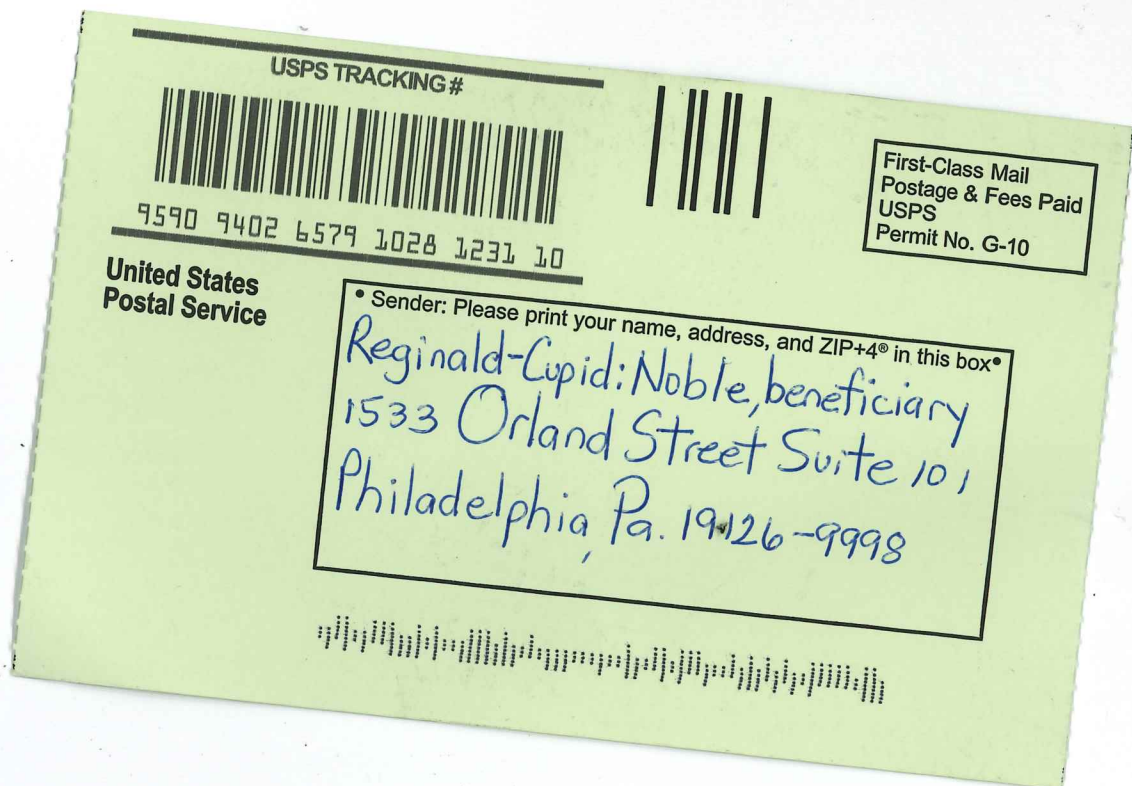
It is hereby ordered and granted that an Injunction and Restrain Order is granted in favor of the Plaintiff.

It is so ordered and granted with prejudice.

J

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 		<p>A. Signature </p> <p><input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
<p>1. Article Addressed to:</p> <p>Marcia Fudge, Secretary U.S. Housing & Urban Development 2344 Rayburn Hob. Washington, D.C. 20515</p>  <p>9590 9402 6579 1028 1231 10</p>		<p>B. Received by (Printed Name)</p> <p>C. Date of Delivery 02/14/2022</p>	
<p>2. Article Number (Transfer from service label)</p> <p>7020 3160 0002 2616 3485</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
<p>PS Form 3811, July 2020 PSN 7530-02-000-9053</p>		<p>Domestic Return Receipt</p>	

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 		<p>A. Signature </p> <p><input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
<p>1. Article Addressed to:</p> <p>Robertson, Anschutz, Schneid, Crane, Partners PLLC 133 Gaither Drive Suite F Mount Laurel, New Jersey 08054</p>  <p>9590 9402 6579 1028 1231 03</p>		<p>B. Received by (Printed Name)</p> <p>C. Date of Delivery</p>	
<p>2. Article Number (Transfer from service label)</p> <p>7020 3160 0002 2616 3478</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>RECEIVED</p> <p>FEB 17 2022</p>	
<p>PS Form 3811, July 2020 PSN 7530-02-000-9053</p>		<p>Domestic Return Receipt</p>	



To U.S. District Clerk

02/24/2022